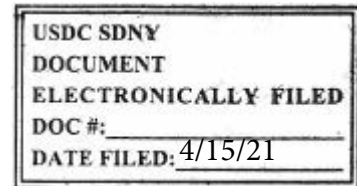




**ROSENBAUM & ROSENBAUM, P.C.**  
ATTORNEYS AT LAW

100 Wall Street, 15<sup>th</sup> Floor New York, NY 10005 Tel 212.514.5007 Fax 212.514.9178 www.rosenbaumnylaw.com



April 13, 2021

**Via ECF**

Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
500 Pearl Street, Courtroom 20A  
New York, New York 10007

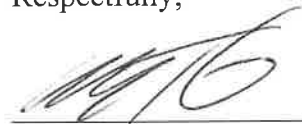
**Re: Wiggins v. Liakas Law, P.C., et al.,  
Action No.: 1:21-cv-00772**

Dear Judge Nathan,

This office represents plaintiff Reginald Wiggins in connection with the above-referenced case. The reason for this letter is to seek an adjournment of defendants' motions to dismiss to June 3, 2021, with plaintiff's opposition to be served by May 20, 2021 and defendants' replies due June 3, 2021. This is the first request for an adjournment of the motions and both defendants have consented to the requested adjournment and proposed briefing schedule. The reason we are requesting this adjournment is because we have a very heavy motion calendar this month and would not currently be able to properly and timely oppose defendants' motions.

Respectfully,

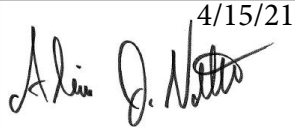
By:

  
Matthew T. Gammons, Esq.  
Rosenbaum & Rosenbaum, P.C.  
100 Wall Street, 15<sup>th</sup> Floor  
New York, New York 10005  
212-514-5007  
[mg@rosenbaumnylaw.com](mailto:mg@rosenbaumnylaw.com)

CC: **Via ECF**

*Catalano Gallardo & Petropoulos, P.C.*  
*100 Jericho Quadrangle, Suite 326*  
*Jericho, New York 11753*

*Rivkin Radler LLP*  
*926 RXR Plaza*  
*Uniondale, New York 11556*

  
4/15/21  
SO ORDERED.  
ALISON J. NATHAN, U.S.D.J.

The Court hereby adopts the parties' amended motion schedule. In addition, the request to adjourn the initial pretrial conference, Dkt. No. 28, is GRANTED. The initial pretrial conference is hereby adjourned to July 30, 2021 at 3:00 p.m. SO ORDERED.